

ARRA Conference Call Notes for April 13th, 2009

Kerry Garber: Introduction on CFP General Issues

Point 1: Regular allocations: will be up slightly for **most** LEAs and preliminary figures for other Titles will be coming in the near future. Title IIA looks to be up slightly, while Title IV will be level funded statewide. There is no allocation for Title V and **transfers into Title V are no longer allowed.** Carry-forward money currently in Title V will be available to spend until September 30, 2009. Title V money not spent by that date will be lost to LEAs and the State.

Point 2: ARRA funds will be distributed via a separate, but similar, grant application.

Questions asked on the call

1. Are there additional assurances attached to the funds that we will be receiving, beyond the assurances that we are used to signing off on in the Consolidated Federal Grants?

Answer: There will be more reporting requirements as this money will be more transparent with higher accountability provisions; we are unaware of other additional assurances that may be required of LEAs.

2. Are there any "maintenance of effort" rules attached to the ARRA funding going to LEAs (SUs)?

Answer: Yes, Maintenance of Effort requirements remain in effect for Title I ARRA funds. Maintenance of Effort essentially means that the local effort (read local/state dollars) don't decrease because of an influx of federal dollars. That is, one is expected to maintain one's current local effort. Usually, if this local effort decreases by more than 10%, a like percentage is taken from the federal funds available. Meeting MOE requirements mean that local and state dollars continue to flow to your schools in similar amounts, regardless of federal funding.

3. For Title I, in a "targeting and ranking" context, I think that it is true that, before allocating funds to individual Title I eligible schools, a supervisory union can allocate funds to particular district-wide purposes. What are the guidelines for how an SU can use funds that it allocates for district wide purposes?

Answer: LEAs with more than 1,000 students are still required to target and rank; however, district wide strategies are also allowed. Please understand that in theory, Title I schools must be in agreement w/ the LEAs about dollars that are taken off the top to support LEA wide initiatives, as barring LEA-wide initiatives, this money would go to schools for their use. Unless every school within the LEA is a Title I Schoolwide program, LEA-wide strategies must be treated as if they were being used in a targeted assistance school. That is, only Title I staff and/or eligible students may participate in them or be served by them.

4. Is it possible that the FY10 allocations are wrong? We are receiving less from both sources when compared to last year (FY09).

Answer: We plan to check with our fiscal people to ensure these allocation figures are correct. However, there were 947 fewer Formula children in Vermont LEAs according the statistically

updated Census data. What that means is some Vermont LEAs have lost critical mass for eligibility for some or all of the four pots that make up local Title I allocations. Also, relative poverty within the State continues to shift. Thus, while hold harmless amounts to date have kept LEAs from seeing a sharp decline in Title I funding, the larger amounts realized by the infusion of ARRA funds translates into a more precipitous drop in Title I funds for others.

5. When you listed the Professional Development opportunities to spend during the call, would most of these be available only under a SWP plan?

Answer: For many of those listed, yes. Please understand that if these strategies were not limited to Schoolwide programs, the audience for them would be quite limited. When perusing the allowable uses for Title I ARRA dollars listed on the Title I Fact Sheet and elsewhere, please be advised that many of these strategies may only be allowed in Title I schoolwide programs and not in Title I targeted assistance schools. For example the use of RTI while embraced by the Feds for use in Schoolwide programs has been disallowed as a Title I funded activity in targeted assistance schools.

6. Would the PD opportunities that are already under way be considered supplanting if funded through ARRA?

Answer: Perhaps not, IF they were expanded upon and/or enhancements were added.

7. Please say more about the carry-forward provision. Do we have to spend our money by Sept. 10 2010?

Answer: For Title I, the FY10 allocation (includes both regular & ARRA) 85% must be expended or obligated by September 30, 2010, or a waiver will be required to carry over the excess. Waivers will be generously entertained.

8. What about set-asides?

Answer: The regular Title I requirements apply to ARRA funds. One requirement that may be waived (or not applied) is the 20% set aside for SES and Choice related expenses. That 20% might only be applied to non-ARRA Title I funds. The USDOE is considering this and will inform us if this indeed will be the case.

9. What are the allowable administrative costs for the Title I ARRA money?

Answer: 10% maximum

10. When will the stimulus application be available?

Answer: Uncertain at this time, but certainly within two months.

11. Will there be restrictions and guidelines as to what can go to LEA vs schools?

Answer: No, however, LEAs will be required to target and rank and schools must agree when Title I dollars that are taken off the top to support LEA wide initiatives. Otherwise the money supporting those LEA-wide strategies would go to the schools.

12. Assuming there are 2 applications, how will the T/R work?

Answer: Uncertain at this time, although we suspect a Targeting and Ranking page will need to be included in each application.

13. If we are not doing TR in the regular allocation, will we have to in the ARRA application?

Answer: Not as long as your student population remains below 1,000.

14. Is the Title I carry-forward 15% for ARRA as well as the regular allocation?

Answer: Yes, remember, the two sources make up a single allocation. If you have not spent or obligated 85% of your FY10 Title I allocation by September 30, 2010, you will have to request a waiver to carryover the excess.

15. What is the start date for the money?

Answer: Once an approved application is submitted, but not before July 1, 2009.

16. Will the ARRA funds have an amendment process?

Answer: Yes

17. If the allocation is part of the overall Title I package, why are there two grant applications?

Answer: The reporting requirements must be accounted for separately, thus the funds must be tracked separately, thus the funds are granted via separate applications.

18. Is the purchase of equipment allowable with I and/or IID?

Answer: Yes. For Title I equipment might well be funded in a Title I Schoolwide program where it was a part of the Schoolwide plan; For Title IID equipment is an allowable use of funds as long as 25% of the IID funds go to IID professional development. In both instances, purchases must be **both** “Reasonable **and** Necessary”

19. Will Vermont and/or LEAs be able to apply for waivers?

Answer: For some things, yes. Federal waiver guidance is currently being drafted and we have been told it will be forthcoming soon.

Further Questions

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